

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

JOE FRATTAROLA and LUCIANO CARBONE,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

PROSEGUR SECURITY USA INC.,

Defendant.

Case No. 7:23-cv-00137-CS

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR
FINAL APPROVAL OF CLASS AND COLLECTIVE ACTION SETTLEMENT**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Plaintiffs'
Unopposed Motion for Final Approval of Class and Collective Action Settlement and the
Declaration of Molly A. Brooks and the exhibits attached thereto, Plaintiffs respectfully request
that the Court enter an Order:

- (1) Granting final approval of the Settlement Agreement and Release, attached as
Exhibit 1 to the Brooks Declaration;
- (2) Finally certifying the settlement class under Fed. R. Civ. P. 23(a) and (b)(3) for
purposes of effectuating the Settlement;
- (3) Incorporating the terms of the Settlement Agreement; and
- (4) Retaining jurisdiction solely for purposes of enforcing the Settlement Agreement.

* * *

Plaintiffs also submit a Proposed Order for the Court's convenience.

Dated: May 7, 2025

New York, NY

Respectfully submitted,

/s/ Molly A. Brooks

Molly A. Brooks

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